

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE**

*
* **United States of America** *
*
* **v.** *
*
* **Dale Stewart** *
*

No. 1:23-cr-00060-SE-TSM

MOTION TO AMEND CONDITIONS OF RELEASE – CONDITION 7(O)4
(ELECTRONIC LOCATION MONITORING)

NOW COMES the defendant, Dale Stewart, by and through counsel, Mark L. Sisti, Esq., and respectfully requests that this Honorable Court Amend the Conditions of Release – Specifically Condition 7(O)4 (Electronic Location Monitoring) with respect to the above-captioned matter.

As grounds for and in support of this motion it is stated:

1. The defendant is charged with three (3) counts of Possession of an Unregistered Firearm (Destructive Device) contrary to 26 U.S.C. § 5861(d).
2. An Order Setting Conditions of Release was filed on or about October 23, 2023.
3. Since the defendant’s release on or about October 23, 2023, the defendant has been gainfully employed and compliant with his conditions.
4. It is respectfully requested that condition 7(O)4 (electronic location monitoring) be removed from his Conditions of Release.
5. Probation Officer Matthew Farwell does not object to the removal of the electronic location monitoring.

6. AUSA Cesar Vega has been contacted and he indicated that he does not assent to the removal of the electronic location monitoring.

WHEREFORE the defendant respectfully requests that this Honorable Court grant the following relief:

- A. Amend the Conditions of Release to Remove Condition 7(O)4 (Electronic Location Monitoring); or
- B. Schedule a Hearing on this request; and
- C. For such further relief as may be just.

Respectfully Submitted,

Dated: February 2, 2024

/s/ Mark L. Sisti, Esq.
Mark L. Sisti, Esq.
NH Bar No.: 2357
Sisti Law Offices
387 Dover Road
Chichester, NH 03258
(603) 224-4220
info@sistilawoffices.com

CERTIFICATION

I hereby certify that on this 2nd day of February 2024 that a copy of the foregoing Motin to Amend Conditions of Release – Condition 7(O)4 (Electronic Location Monitoring) has been forwarded to AUSA Cesar Vega, US Attorney's Office, through the Court's electronic filing system.

/s/ Mark L. Sisti, Esq.
Mark L. Sisti, Esq.